

# Managing Provider Performance

GLA AEB Grant-funded provision monitoring and  
intervention policy 2023-2024 for Independent Training  
Providers

Version 2

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## Summary

1. Since the Adult Education Budget was delegated to the Greater London Authority (GLA), the breadth of Independent Training Providers (ITPs) with access to AEB funding has significantly increased. Therefore, the GLA have determined that a tailored approach to monitoring Independent Training Provider's performance for quality and financial stability is required.
2. This document sets out when the GLA will intervene when performance or financial resilience of a provider is below expected levels. Furthermore, the document details the quality requirements expected of grant funded ITPs. This document supplements the information available in the AEB Grant Funding and Performance Management Rules. Providers should refer to the AEB Grant Funding and Performance Management Rules, this document and their funding agreement.
3. This document will be periodically updated to ensure that policy aligns to the requirements of GLA performance and measurements, alongside national policy requirements. Any updates will be clearly marked in new versions.
4. The GLA also delivers delegated Skills Bootcamps provision. The GLA's Skills Bootcamps are delivered by ITPs. Skills Bootcamps providers are also expected to adhere to this Managing Provider Performance policy.
5. This publication is primarily intended for Independent Training Providers in receipt of a Conditions of Funding (Grant) Agreement (the funding agreement) with the GLA. This includes:
  - Independent Learning Providers
  - Independent Specialist Providers
  - Subcontractors to Independent Learning Providers and Independent Specialist Providers
6. In addition, this document may also be of interest to:
  - Learners who wish to see how providers are monitored for performance;
  - Department for Education (DfE);
  - Education and Skills Funding Agency (ESFA);
  - Office for Standards in Education, Children's Services and Skills (Ofsted);
  - Further Education (FE) Commissioner;
  - Mayoral Combined Authorities (MCAs);

- Office for Students; and
- Other education and training providers

7. If you are a learner who wishes to provide feedback on your education/training, please refer to the information available on <https://www.london.gov.uk/what-we-do/jobs-and-skills/adult-education-budget> for information on how to share your views with the GLA.

## What's New?

Section	Paragraph	Change
Document Structure	N / A	The document has been revised improve readability, such as in the intervention process
Terminology	N / A	Deletion of the reference to the AEB Procured Programme, as this concluded in July 2023
Role of the GLA Provider Manager	12-14	Inclusion of conduct guidelines for Provider Managers and providers
Skills Bootcamps	15-16	Clarifying the role of AEB and Skills Bootcamps Provider Managers
Monitoring delivery	18	Change to monitoring visit frequency from quarterly to termly. Reference to Skills Bootcamps Delivery Handbook.
Monitoring delivery	20	Consideration of supply of performance data in advance of the termly monitoring meeting
Monitoring delivery	22-23	Requirement for providers to supply their GLA Provider Managers with policy documents in line with their grant agreement, prior to delivery and subsequently on an annual basis
Matrix Standard	25-26	Inclusion of the requirement to achieve the revised matrix Standard
Working with other agencies	29	Inclusion of MCAs as a partner and expectation to inform the GLA if the provider enters intervention measures
Working with other agencies	31	Additional requirements relating to Ofsted inspections and role of Ofsted regarding subcontracted delivery
Working with other agencies	32	Requirement to inform the GLA if the provider enters intervention measures with the ESFA
Interventions Flowchart	Fig 1	Intervention process expressed as a flowchart for clarity

Termination	43	Information on termination clauses
Active Support	Table 3	Extension of consultations to principal, local stakeholders and learners
Active Support and Interventions Table	Table 3	Interventions process presented in table format for clarity
Active Support and Interventions Table	Table 3	Addition of criteria for returning to normal monitoring procedures (exiting intervention)
Educational Performance Data	46	GLA will look to benchmark provider ILR returns against national achievement rates
Subcontracting Arrangements	52-54	Removal of paragraphs which are covered in the AEB Funding Rules
Subcontracting Arrangements	53	GLA approach to ESFA subcontracting standard for ESFA funded providers
Further Queries	N / A	Addition of contact details for further queries on the policy

## Future Changes

8. The [Skills and Post 16 Education Bill](#) and the reforms set out in the [Skills for Jobs White Paper](#), have provided updated national arrangements for intervention and support in the skills sector. To ensure this guidance continues to support the delivery of Skills for Londoners Roadmap, we are committed to considering these changes when developing future approaches to managing provider performance to support a positive impact on outcomes for Londoners. Details of these changes will be included in future versions of this document.

## Terminology

9. “Funding agreement” means the Conditions of Funding, the attached Appendices to the Conditions of Funding and any documents or parts thereof, policies or guidance specified in this Agreement and any variation to the Agreement accepted by the GLA in OPS (as the same may be amended, added to, supplemented, substituted or varied in accordance with the terms of this Agreement).
10. “OPS” means the "GLA Open Project System", being the GLA’s on-line management information system (MIS), or any successor system and/or any other system which performs any of the same functions and which GLA notifies to the Body from time to time.
11. Where this document refers to “delivery year” this is taken to mean 1 August to 31 July in a calendar year.

## Approach to Performance Management

### Role of the GLA Provider Manager

12. Each provider will have a named GLA Provider Manager who will work with a number of grant-funded providers and act as the first point of contact when managing the funding agreement between the GLA and the provider. The GLA Provider Manager will be responsible for monitoring providers throughout the life of the funding agreement, including when performance is below the level as set out in the contract, and will visit the provider on a termly basis to discuss performance.
13. The Greater London Authority (GLA) respects the dignity of all employees and values the contribution they make. The GLA has a zero-tolerance approach to all forms of bullying, harassment, discrimination and victimisation, and is committed to



providing a working environment that is open, inclusive and in which everyone is treated with respect. As such, the GLA expects organisations holding a funding agreement with the GLA to treat GLA staff (including the provider manager) with respect at all times.

14. The GLA Provider Manager will conduct themselves at all times in line with the GLA's Code of Ethics.
15. Providers should also adhere to the following line in the GLA's Code of Ethics, which states that every employee of the GLA 'has a right to a working environment, which encourages harmonious, considerate and dignified working relationships. Staff should show respect at all times to other colleagues at all levels and should not disrupt their work in any way. Staff should apply the same high standards of conduct in dealings with their colleagues at all levels, as with the public.
16. Where a provider is also in receipt of GLA Skills Bootcamps funding, the GLA AEB and Skills Bootcamps teams will share intelligence in relation to provider performance and risk. Skills Bootcamps providers should refer to the Skills Bootcamps Delivery Handbook for the approach to performance management on that programme.
17. Where the risk or issue relates to a single funding stream, the GLA Provider Manager for the relevant funding stream will lead on the GLA response. Where the risk or issue relates to both programmes, the GLA Provider Managers will liaise to form a joint approach to interventions and risks to delivery of provision.

## **Monitoring Delivery**

18. Provider managers will seek to work collaboratively with providers to support them in delivering the provision set out in their funding agreement and delivery plans. Provider managers will monitor performance to identify where providers are at risk of underperforming against their funding agreement. Where providers are at risk of underperformance, their provider manager will implement actions to improve performance or to prevent poor performance.
19. If a provider is not currently in receipt of AEB funding by the GLA and is successful in a competitive grant award or procurement process, their GLA Provider Manager will arrange an in-person gateway visit prior to the commencement of their funding. This check is for the Provider Manager to ensure that the provider is ready to commence delivery of provision, in addition to checking that the provider can meet the conditions of their funding agreement. This will include a request to view copies of policies required of the provider through their grant agreement.
20. Table 1 sets out the business cycle of information returned by providers and the envisaged timing of termly GLA AEB Provider Manager visits. Skills Bootcamps

timelines will be communicated separately in the GLA Skills Bootcamps Delivery Handbook.

<b>Table 1 – Monitoring Delivery Timetable</b>		
<b>Month</b>	<b>Business Cycle Activity</b>	<b>GLA AEB Provider Manager visits</b>
August	Delivery for new academic year begins R12 ILR return - Previous academic year	
September	R01 ILR return R13 ILR return - Previous academic year	
October	R02 ILR return R14 ILR return - Final return from previous academic year	Term 1 onboarding or monitoring visits begin
November	R03 ILR return Subcontracting plan approvals for next academic year	Term 1 onboarding or monitoring visits end
December	R04 ILR return Providers sent reconciliation statement for previous academic year	
January	R05 ILR return Indicative allocation for next academic year (multi-year grant providers will not be subject to this process)	
February	R06 ILR return Mid-year claim and mid-year forecast (multi-year grant providers will not be subject to this process)	Term 2 monitoring visits begin

March	R07 ILR return	Term 2 monitoring visits close
April	R08 ILR return Allocation statements issued for next academic year	
May	R09 ILR return	Term 3 monitoring visits begin
June	R10 ILR return Providers should submit any subcontracting plans in advance of next year delivery End of year claim	Term 3 monitoring visits close
July	R11 ILR return End of year 1 delivery Financial planning information return	

21. During the above business cycle, providers will be made aware of opportunities to bid for additional funding, if available.
22. The GLA Provider Manager will take the opportunity at the termly meetings to share information and discuss performance based on the information provided by each provider and the monitoring information in Table 2. The GLA Provider Manager will also give the provider an agenda in advance of the meeting, in order to facilitate an informed discussion. The GLA are considering the use of sharing performance data with providers in advance of the termly meeting to facilitate the meeting discussion.

<b>Table 2 – Monitoring Information</b>	
<b>Information</b>	<b>Monitoring discussion in respect of AEB</b>
Individualised Learner Record (ILR) data returns	The timeliness and accuracy of ILR data related to London residents studying AEB.  We send communication to providers in-year to ensure data errors are corrected before the R14 ILR Final data return. This return is a ‘hard close’, after which ILR data cannot be changed.
Funding claims	Performance against funding agreement as shown in the mid-year, year-end and final claims, and whether the total funding

	value should be adjusted to better reflect the level of performance.
Ofsted inspections	The outcome of any recent Ofsted inspection monitoring visit and the quality improvement actions which the provider is implementing to secure better provision.
Initiative and other skills funding	The progress with the delivery of any initiative or growth funding allocated in addition to the grant funding allocation and other funding streams (e.g. Free Courses for Jobs)
Financial health assessments	The outcome of any review of the financial performance information where there are risks to the delivery of AEB and improvement action is required.
Audit and fraud investigations	The report of audit processes, in particular where findings are qualified or require management action.  Upheld investigations related to college financial management and governance and/or funding audits and/or significant fraud or fraud practice.
Subcontracting plan	Progress with the delivery of the AEB subcontracting plan and any issues with performance.
Participant feedback and complaints	Information required to investigate a complaint raised by a learner.
London Learner Survey	Baseline survey completion rates and actions taken by the provider to increase completion rates among funded learners.
Other	Any other information applicable to determine the level of risk associated with delivering the contract.

23. If, based on the discussion about performance, a provider is unlikely to meet its overall funding agreement, the GLA reserves the right, at its discretion, to reduce the funding agreement in line with performance.
24. The GLA Provider Manager will request copies of policies mentioned in the provider's grant agreement at their first meeting of the academic year or at an onboarding gateway visit for new GLA programmes. The list of required policies is below, although these areas may be covered in separate or combined policies at provider discretion. This may change in future grant agreements.

- 22.1. Equality & Diversity Policy
  - 22.2. Sustainability Policy
  - 22.3. Health & Safety Policy
  - 22.4. Safeguarding Policy
  - 22.5. Data Protection Policy
  - 22.6. Learner Complaints & Whistleblowing Policy
  - 22.7. Grievance & Disciplinary Policy
  - 22.8. Modern Slavery Policy (if applicable)
  - 22.9. Centre Approval status (if applicable)
25. The GLA Provider Manager will request these policies on an annual basis for ongoing programmes, in line with the relevant grant agreement. The provider will be expected to update their policies in line with legal requirements or the renewal date cited in their policy.
26. Providers are required to be aware of the provisions set out in their Grant Agreement's regarding the GLA's expectations regarding the quality of delivery and activities which may be considered as a minor or serious breach of contract. These include, using all reasonable endeavours
- 24.1. To ensure competent and appropriately qualified staff deliver and assess learning.
  - 24.2. To offer equality of access to learning opportunities and close equality gaps in learning and outcomes;
  - 24.3. To provide a safe, healthy and supportive environment, which meets the needs of Learners;

### **Matrix Standard**

27. For new providers, the GLA requires providers to work towards the matrix Standard accreditation within the first funding year. If one of the main objectives of provision is to deliver information and advice, matrix Standard accreditation should be achieved in the first funding year. This also applies to any subcontractors where they have responsibility for advice and guidance.
28. A revised matrix Standard was launched in May 2023. We expect new providers to be assessed against the revised standard and for providers who currently hold the

matrix Standard to transition to the revised standard when their next three-year assessment takes place, which should be before the end of 2026.

## Working with other agencies

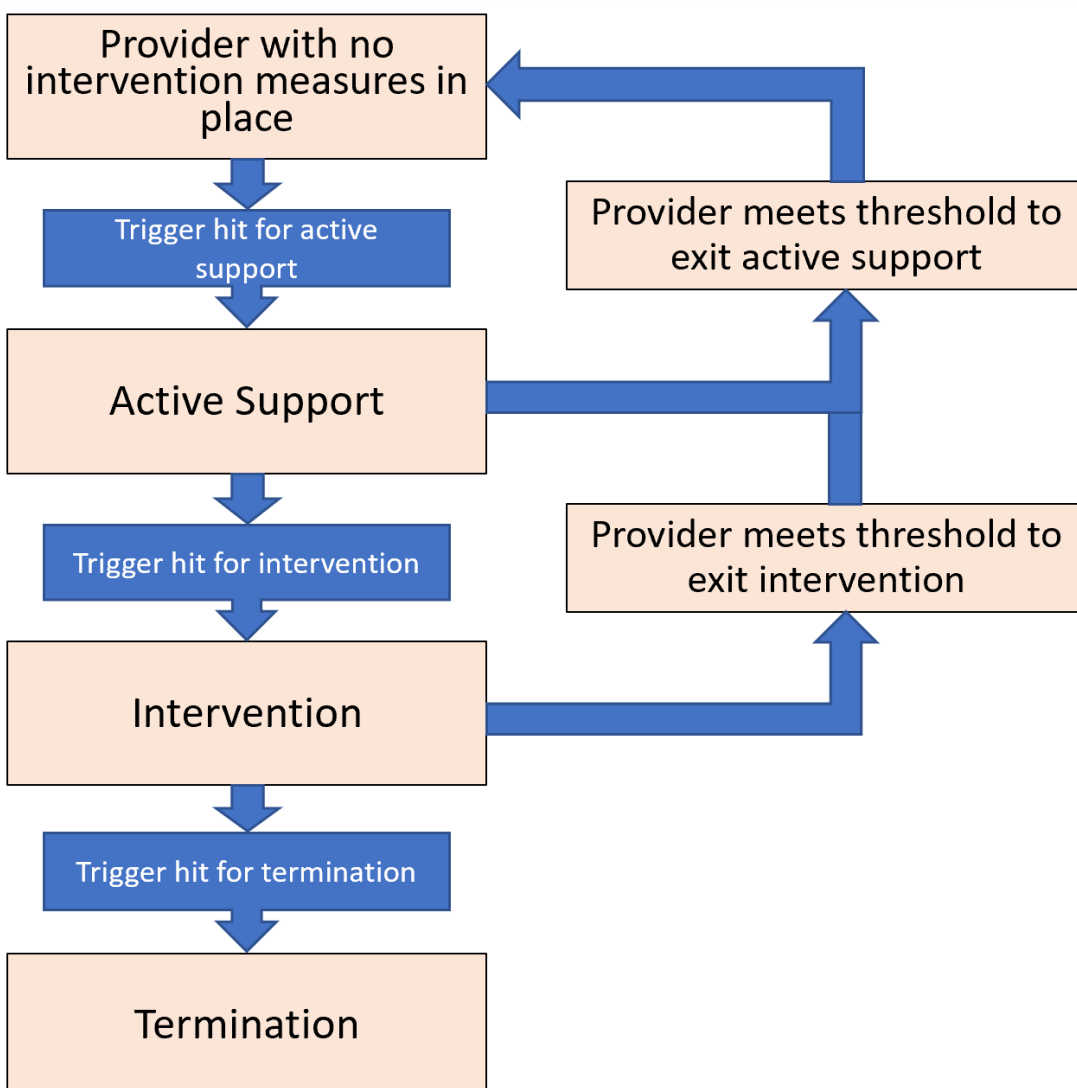
29. The GLA's Skills and Employment Delivery Teams will work with partner agencies in line with the [Memorandum of Understanding](#) for the delegation of certain adult education functions to the Mayor of London and other Service Level Agreements to ensure that there is oversight of AEB programme delivery for London residents, including:
30. **DfE/ESFA** - Some providers will receive funding from both the GLA and the ESFA in delivering their courses. The GLA will share data and intelligence which indicates concerns over a provider's performance or financial resilience with the ESFA's territorial and case management team to ensure that any measures which are implemented to correct underperformance do not have unintended consequences for the ESFA and vice versa. The ESFA will also share this information with the FE Commissioner. Providers are expected to inform the GLA if they enter intervention measures with the ESFA.
31. **Mayoral Combined Authorities (MCAs)** - Providers may also be in receipt of devolved funding from MCAs. Providers are expected to inform the GLA if they enter intervention measures with any MCA.
32. As noted above, most providers will hold a funding agreement directly with the ESFA. While the GLA and ESFA will share intelligence in relation to provider performance and risk, this does not mean that the GLA will act to impose measures that correct underperformance against the ESFA contract. GLA Provider Managers will only instigate intervention measures when indicators evidence a risk to the viability of the GLA funding agreement.
33. **Office for Standards in Education, Children's Services and Skills (Ofsted)** - AEB provision funded by the GLA is in scope for inspection by Ofsted. Providers who are subject to an Ofsted inspection must make GLA colleagues aware of the inspection on receipt of the notice and invite the GLA provider manager to attend the feedback meeting. Following inspection, the GLA Provider Manager will review the outcomes of inspection and discuss any actions required to improve quality. Providers will be required to submit an 'Improvement Action Plan' to the GLA in the event of a 'requires improvement' Ofsted grade
34. As described above, the GLA reserves the right to discuss concerns regarding a provider's performance or financial stability with partner agencies, such as the DfE, ESFA and Ofsted, in accordance with the provider's Conditions of Funding (Grant) Agreement and Memorandum of Understanding. Where the GLA has been notified that the ESFA has made its own assessment of financial health, which has triggered

active support or intervention, the GLA will work with the provider and the ESFA to ensure that any improvement actions are complementary to deliver rapid improvement.

## Intervention Process

35. This section defines the three stages of support and intervention measures the GLA may apply. These are active support, intervention and termination. Please see the Interventions and Active Support table for information on the triggers for each of the stages of intervention. The Interventions and Active Support section also outlines the steps providers can take to exit active support and intervention. The diagram below outlines the broad process for intervention.

**Figure 1 – Intervention Process Flowchart**



## Active Support

36. In alignment with the ESFA, we are replacing all activity outside of intervention with a range of active support measures, which complements the support from the FE Commissioner and ESFA. This active support replaces early intervention and opens up new forms of support to Independent Training Providers. The details of the GLA's active support offer will be included in future versions of this document.
37. GLA provider managers will work with providers to ensure that provision is of a high quality and that providers maintain financial stability. If the GLA decides to place a provider into Active Support, the GLA will write to the provider to confirm the position. The triggers for a provider to enter Active Support are covered in the Interventions and Active Support Table. The GLA reserves the right to review the intervention triggers and corrective actions in line with national policy, once available.
38. Should one or more of the above triggers be hit, the provider must complete an improvement action plan which must be submitted to the GLA Provider Manager for approval. The action plan must include a series of actions to remedy, or mitigate further consequences, of the trigger being breached. Each action must be:
  - **Specific** – how the action will realise a clear improvement in the financial resilience or quality of the provider;
  - **Measurable** – a measurable value or indicator which will be realised as a result of the action;
  - **Attributable** – a named officer or officers will have responsibility for achieving the action;
  - **Realistic** – how the action will gain the desired improvement within the available resources; and
  - **Timebound** – achievable within a realistic timeframe.

## Escalation

39. If the provider fails to agree an improvement action plan, does not implement the improvement action plan as agreed or does not meet the agreed milestones, the GLA may, at its discretion, implement further measures of intervention including, but not limited to, reducing the allocation value or suspending payments or increasing the level of intervention.

## Intervention



40. Intervention is the formal process of managing underperformance of providers and can be triggered by financial or quality standards.
41. Should an Intervention trigger be realised, the GLA will explore a range of options to address the issues identified. If the GLA decides to continue to support the provider to improve, the provider must complete a SMART improvement action plan which must be submitted to the GLA Provider Manager. The improvement action plan must include a range of activities to remedy, or mitigate further consequences, of the trigger being breached to secure rapid improvement.
42. The GLA Provider Manager will assess the proposed action plan and implement further actions to bring financial and quality performance in line with contracted levels. In addition to the actions available in the active support mitigation process, the GLA may implement further measures of intervention, including:
  - 40.1 require providers to suspend the recruitment of Learners to, and/or to cap any growth in Learner numbers; and/or
  - 40.2 give consideration to what changes, if any, are required in its allocations when finalising the amount of Funding in any subsequent Funding Agreement ; and/or
  - 40.3 reduce, suspend or recover payment; and/or
  - 40.4 terminate the provider's Funding Agreement, in accordance with the termination clause set out within it; and/or
  - 40.5 referral to partner agencies such as the ESFA
41. The actions in paragraph 37 need not be enacted in order and the GLA may apply them at its absolute discretion.
42. When a provider exits Intervention, the GLA reserves the right to implement additional measures to the usual monitoring process or require the provider to enter active, so that the risk of future declines in performance is monitored and quickly mitigated. This will enable the GLA Provider Manager to support the provider to ensure that the provider is supported to stabilise.

## **Termination**

43. The GLA reserves the right to terminate your funding agreement with immediate effect by giving notice in writing if:
  - a. the provider fails to comply with the requirements of their Improvement Action Plan
  - b. the provider commits a Serious Breach of Contract

c. the provider meets any of the termination triggers elsewhere in this document

44. A full overview of the circumstances which may lead to the GLA terminating a funding contract, and the steps the GLA will take to enforce this act, are set out in the provider's Funding Agreement. The circumstances are not limited to those set out in the Interventions and Active Support table in Appendix 1.
45. The table outlines the potential actions the GLA may take with regards to your funding agreement where intervention criteria are met. The GLA reserves the right to take actions outlined within the table, but these will be applied on a case-by-case basis.
46. The GLA additionally reserves the right to terminate your funding agreement with immediate effect by giving notice in writing if any of the termination criteria are met.
47. Where the provider is also subject to Contract Management actions by the ESFA through the national oversight arrangements, the GLA will work with the ESFA to ensure that action to improve performance is complementary.
48. The GLA Provider Manager will maintain dialogue with the provider and assist in supporting the provider back to financial resilience and an acceptable level of quality. The GLA Provider Manager will review the information provided and discuss actions directly with the provider, providing supplementary actions if necessary.

### **Financial Health Checks**

49. Providers in receipt of funding from both the ESFA and the GLA will be subject to financial health checks from the ESFA. The GLA may independently check financial health of providers, in order to support the financial stability of providers.

### **Subcontracting Arrangements**

50. Providers are responsible for all the actions of their delivery subcontractors connected to, or arising out of, the delivery of the services which they subcontract. Providers must manage and monitor all delivery subcontractors to ensure that high-quality delivery is taking place that meets the GLA's AEB Funding Rules. This includes the GLA reserving the right to take action in relation to Ofsted inspections of subcontracted delivery or undeclared subcontracting, as outlined in your GLA grant agreement.

### **Further Queries**

If you require any further guidance on the policy, please contact your Provider Manager or direct your query to [aeb@london.gov.uk](mailto:aeb@london.gov.uk).

# Appendix

## Appendix 1 – Interventions and Active Support Table

Interventions and Active Support			
Intervention criteria/ trigger	Intervention level	Additional actions we may take	Threshold to exit intervention
<b>Quality of provision</b>			
An 'Insufficient progress' rating for overall effectiveness in an Ofsted monitoring report	Active support		<p>A 'Sufficient progress' rating for overall effectiveness in the subsequent Ofsted monitoring report</p> <p>Ofsted reinspection has determined that the overall effectiveness of the provider is rated 'Good' or above</p> <p>The provider's educational performance data evidences improvement agreed within the provider's action plan</p> <p>Resolution of complaint such that the Provider Manager recommends, at their absolute discretion, a return to normal monitoring procedures</p>
A 'Requires Improvement' rating for overall effectiveness by Ofsted	Active support		
Poor and/or a measurable decline in performance management data (as outlined in the "Quality Assurance and Raising Standards" section of the providers funding agreement)	Active support		
Escalation by the GLA Provider Manager due to local intelligence, such as complaints or poor-quality data returns.	Active support		
A decline in the provider's educational performance data or low achievement rates	Intervention		The provider's educational performance data evidences improvement agreed within the provider's action plan
An Ofsted inspection results in the Provision in part or overall being assessed as inadequate	Termination		
An Ofsted monitoring visit results in the Provision being assessed as having made "insufficient progress" and in the reasonable view of the GLA Learners may be at immediate risk on safeguarding grounds, and/or	Termination		

the quality of leadership and/or training provision is such that one or more Learner has no reasonable prospect of achieving their training objective			
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### Financial health and stability of the provider

ESFA Financial Health assessment determines that the provider's financial health 'Requires Improvement', or 'Inadequate' and/or the provider's financial information shows that the provider may not be able to meet liabilities in future;	Active Support		The GLA or ESFA Financial Health Assessment indicates that the provider's financial health is rated as 'Good' or above
The GLA or ESFA Financial health assessment is 'Inadequate';	Intervention		
The outcome of any financial health and/or control assessment undertaken in relation to the provider is inadequate;	Termination		

### Audit, assurance, fraud and investigations

<p>The GLA or the Mayor's Office of Policing and Crime (MOPAC), acting on behalf of the GLA, determine there is enough information to investigate an allegation of fraud or financial irregularity, including:</p> <ul style="list-style-type: none"> <li>•A funded provider has claimed funding from the GLA through deception;</li> <li>•A funded provider has broken the funding rules;</li> <li>•A funded provider has not delivered education/ training funded by GLA;</li> <li>•Corruption (the offering, promising, giving, requesting, receiving, or agreeing to</li> </ul>	Intervention	<p>Additional actions required by the intervention can include but are not limited to:</p> <ul style="list-style-type: none"> <li>• Additional meetings with the GLA Provider Manager and MOPAC Auditor</li> <li>• A review and/or retention of learner files</li> <li>• Contact with learners and/or subcontractors to verify information contained in learner files</li> </ul>	When financial irregularity or fraud investigation is resolved satisfactorily.
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<p>accept an inducement or reward, which may influence a person to act against the interests of the GLA) and bribery – for example, in relation to sub-contracting.</p>			
<p>A qualified opinion resulting from a funding audit;</p> <p>A fraud or financial irregularity investigation produces evidence to support suspicion or allegations;</p> <p>A provider fails to provide audit and assurance documents required by the GLA (to be set out in an audit code of practice).</p>	<p>Intervention</p>	<p>The ESFA and other funding agencies will be informed of allegations that affect their funding streams.</p> <p>The GLA reserve the right to implement one or more of the following actions:</p> <ul style="list-style-type: none"> <li>• Consultations with the Body's governors, principal, and, where required, local stakeholders and learners</li> <li>• Request additional data on a regular basis, such as ILR data returns, monthly management accounts and financial information, reports submitted to the provider's senior management team</li> <li>• Impose additional performance monitoring points and meetings with the GLA Provider Manager</li> <li>• Require information which demonstrates how the provider is planning to tackle financial health decline. This may include undertaking a cost scrutiny exercise to identify how to reduce costs and/or bring them within sector standards and/or an assessment of the impact of any funding claw back or reduction on planned income</li> <li>• Request the provider's risk plan</li> <li>• Request information on planned strategic developments, including but not limited to federation or merger arrangements</li> <li>• Require from provider's internal auditors on the management of the</li> </ul>	<p>A satisfactory follow-up audit following receipt of a qualified opinion;</p> <p>MOPAC Recommendations are satisfactorily implemented and any clawback decisions are complied with;</p> <p>The provider complies with the GLA's audit and assurance requirements.</p>

		provider, including financial compliance and health  •Require from the provider the Self-Assessment Reports, Quality Improvement Action Plans and implementation updates	
<b>Other</b>			
Failure to comply with active support measures.  Minor breach of the GLA grant agreement.	Intervention		GLA requirements being satisfactorily addressed
Serious breach of the GLA grant agreement.	Termination		

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